

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH BOLOGNA, et al.,

Plaintiffs,

v.

TRACY TRIPP, et al.,

Defendants.

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**CIVIL ACTION
No. 24-cv-3185**

**DEFENDANT CITY OF PHILADELPHIA’S ANSWER, WITH AFFIRMATIVE
DEFENSES, TO PLAINTIFFS’ COMPLAINT**

Defendant, the City of Philadelphia (“City” or “Answering Defendant”), hereby files this Answer, with Affirmative Defenses, to Plaintiffs’ Complaint (ECF No. 1), and aver as follows:

I. FACT SUMMARY

1. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs’ statement of the case and, therefore, require no response. To the extent a response is required, denied.

2. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs’ statement of the case and, therefore, require no response. To the extent a response is required, denied.

3. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs’ statement of the case and, therefore, require no response. To the extent a response is required, denied.

4. Plaintiffs’ allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

5. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

6. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

7. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

8. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

9. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

10. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

11. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

12. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

13. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

14. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

15. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

16. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

17. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

18. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

19. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

20. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

21. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

22. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

23. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

24. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

25. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

26. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

27. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

28. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

29. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

30. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

31. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

32. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

33. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

34. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

35. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

II. PARTIES

36. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

37. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

38. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

39. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

40. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

41. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

42. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

43. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

III. JURISDICTION, AND VENUE, AND DEMAND FOR JURY TRIAL

44. The allegations contained in this paragraph constitute conclusions of law and, therefore, require no response. To the extent a response is required, it is admitted that this Court has subject matter jurisdiction under 28 U.S.C. §§ 1331 and supplemental jurisdiction under 28 U.S.C. § 1367(a).

45. The allegations contained in this paragraph constitute conclusions of law and, therefore, require no response. To the extent a response is required, it is admitted that this This Court has supplemental jurisdiction under 28 U.S.C. § 1367(a).

46. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

IV. FACTS COMMON TO ALL COUNTS

47. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

48. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

49. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

50. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

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52. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

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54. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

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60. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

61. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

Krasner's Established Policy of Depriving Police Officers of their Constitutional Rights

62. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

63. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

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119. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

120. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

121. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

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141. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

142. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

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151. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

152. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

153. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

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155. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

156. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

157. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

The Blockade of Interstate 676 ("I-676")

158. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

159. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

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202. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

The Video

203. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

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207. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

208. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

209. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

210. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

211. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

212. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

213. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

214. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

215. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

216. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

217. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

218. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

219. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

220. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

221. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

222. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

223. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

224. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

225. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

226. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

227. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

228. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

229. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

230. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

231. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

232. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

233. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

The Krasner Investigation Interview

234. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

235. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

236. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

237. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

238. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

239. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

240. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

241. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

242. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

243. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

244. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

245. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

246. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

247. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

248. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

249. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

250. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

251. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

252. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

253. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

254. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

255. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

256. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

257. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

258. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

259. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

260. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

261. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

262. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

263. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

264. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

265. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

266. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

267. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

268. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

269. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

270. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

271. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

272. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

273. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

274. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

275. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

276. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

277. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

278. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

279. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

The Affidavit of Probable Cause

280. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

281. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

282. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

283. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

284. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

285. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

286. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

287. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

288. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

289. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

290. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

291. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

292. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

293. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

294. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

295. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

296. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

297. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

298. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

299. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

300. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

301. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

302. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

303. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

304. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

305. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

306. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

307. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

308. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

309. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

310. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

The Criminal Complaint

311. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

312. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

313. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

314. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

315. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

316. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

317. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

318. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

319. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

320. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

321. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

The Prosecution of Joseph Bologna

322. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

323. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

324. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

325. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

326. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

327. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

328. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

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330. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

331. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

332. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

333. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

334. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

335. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

336. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

337. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

338. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

339. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

340. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

341. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

342. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

343. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

344. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

345. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

346. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

347. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

348. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

349. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

350. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

351. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

352. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

353. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

354. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

355. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

356. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

357. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

358. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

359. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

360. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

361. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

362. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

363. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

364. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

365. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

366. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

367. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

368. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

369. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

370. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

371. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

372. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

373. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

374. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

375. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

376. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

377. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

378. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

379. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

380. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

381. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

382. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

383. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

384. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

385. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

386. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

387. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

388. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

389. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

390. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

391. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

392. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

393. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

394. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

395. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

DAMAGES

396. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

397. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

398. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

399. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

400. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

401. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

402. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

403. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

404. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

405. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

406. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

407. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

408. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

409. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

410. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

411. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

412. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

413. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

414. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

415. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

416. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

417. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

418. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

419. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

420. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

421. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

422. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

423. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

424. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

425. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

426. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

427. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

428. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

429. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

430. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

COUNT I
(False Arrest and Malicious Prosecution in Violation of the
Fourth and Fourteenth Amendments - 42 U.S.C. § 1983)
BOLOGNA v. KRASNER, TRIPP, ROCKS AND THE CITY OF PHILADELPHIA

431. Answering Defendant incorporates herein by reference its answers to paragraphs 1 through 430 of the Plaintiffs' Complaint.

432. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

433. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

434. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

435. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

436. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

437. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

438. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

439. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

440. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

441. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

442. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

443. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

444. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

445. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

446. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

447. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

448. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

449. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

450. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

451. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

452. Plaintiffs' allegations pertain to parties other than Answering Defendant and, therefore, require no response. To the extent a response is required, denied.

COUNT II
(Established Policies, Practices, Customs,
in Violation of the Fourth,
Fourteenth, and First Amendments - 42 U.S.C. § 1983)
BOLOGNA v. KRASNER AND CITY OF PHILADELPHIA

453. Answering Defendant incorporates herein by reference its answers to paragraphs 1 through 452 of the Plaintiffs' Complaint.

454. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

455. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

456. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

457. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

458. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

459. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

460. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

461. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

462. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

463. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

464. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

465. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

466. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

467. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

468. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

469. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

470. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

471. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

472. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

473. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

474. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

475. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

COUNT III
(Intentional Infliction of Emotional Distress)
BOLOGNA v. KRASNER, TRIPP, AND ROCKS

476. Answering Defendant incorporates herein by reference its answers to paragraphs 1 through 475 of the Plaintiffs' Complaint.

477. The above count was dismissed by the Court. (ECF 56 at p. 1).

478. The above count was dismissed by the Court. (ECF 56 at p. 1).

479. The above count was dismissed by the Court. (ECF 56 at p. 1).

480. The above count was dismissed by the Court. (ECF 56 at p. 1).

481. The above count was dismissed by the Court. (ECF 56 at p. 1).

482. The above count was dismissed by the Court. (ECF 56 at p. 1).

COUNT IV
(Loss of Consortium)
DIANA BOLOGNA v. ALL DEFENDANTS

483. Answering Defendant incorporates herein by reference its answers to paragraphs 1 through 482 of the Plaintiffs' Complaint.

484. The above count was dismissed by the Court. (ECF 56 at p. 1).

485. The above count was dismissed by the Court. (ECF 56 at p. 1).

V. PRAYER FOR RELIEF

486. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

VI. NOTICE OF PRESERVATION OF EVIDENCE

487. The allegations contained in this paragraph constitute conclusions of law and/or the Plaintiffs' statement of the case and, therefore, require no response. To the extent a response is required, denied.

JURY DEMAND

Answering Defendant demands a jury trial in this action.

AFFIRMATIVE DEFENSES

1. Plaintiffs have failed, in whole or in part, to state a claim against the City.
2. Plaintiffs' claims are barred, in whole or in part, by the statute of limitations.
3. Plaintiffs' claims are barred, in whole or in part, by the doctrines of issue and/or claim preclusion.
4. The acts of the District Attorney, Assistant District Attorneys, and County Detectives, who acted under the supervision of the District Attorney, were superseding causes of the harm Plaintiffs suffered, thus precluding a finding of liability against the City.
5. To the extent the individual defendants are entitled to the defenses of qualified and absolute immunity, Plaintiffs' claims against the City are precluded.
6. The City asserts all immunity to which they may be entitled under the Political Subdivision Tort Claims Act.
7. The City asserts all other common law and statutory immunity to which it may be entitled.
8. Plaintiffs' injuries, sufferings, and/or damages, if any, were caused by the conduct, negligence, recklessness, disregard, criminal and other behavior of Plaintiffs and others.
9. The City is not legally responsible for any of the allegedly tortious conduct included in Plaintiffs' complaint.
10. The City is not liable for the discretionary criminal investigative decisions of the District Attorney and his subordinates that form the basis of Plaintiffs' complaint.

11. Plaintiffs' injuries were not the result of any policy or custom for which the City is legally responsible and over which the City can exercise lawful authority.

12. To the extent that the criminal actions of Plaintiffs bar or limit his claims and/or damages, the City claims same as a defense.

13. To the extent that Plaintiffs' claims are barred by any judicial determination of any state or federal court, the City claims same as a defense.

14. Plaintiffs' claims are barred, in whole or in part, to the extent that they have failed to take reasonable measures to mitigate any or all damages.

15. To the extent probable cause existed to arrest Plaintiff Joseph Bologna, Plaintiffs' claims against the City must be dismissed.

WHEREFORE, Defendant, the City of Philadelphia, denies that it is liable to Plaintiffs, either jointly or severally, and demands judgment in its favor, together with reasonable attorney's fees and the costs of defending this action.

Respectfully submitted,

/s/ Benjamin T. Jackal

Benjamin T. Jackal
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*Attorney for Defendant, the City of
Philadelphia*

Dated: July 16, 2025

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH BOLOGNA, et al.,

Plaintiffs,

v.

TRACY TRIPP, et al.,

Defendants.

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: **CIVIL ACTION**
: **No. 24-cv-3185**
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:
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CERTIFICATE OF SERVICE

I hereby certify that on the date below, Defendant's Answer with Affirmative Defenses to Plaintiffs' Complaint was filed via the Court's electronic filing system and is available for downloading.

Respectfully submitted,

/s/ Benjamin T. Jackal

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*Attorney for Defendant, the City of
Philadelphia*

Dated: July 16, 2025